



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SPN/MKM/KDE  
F. #2015R00747

*271 Cadman Plaza East  
Brooklyn, New York 11201*

November 20, 2018

By ECF

The Honorable Pamela K. Chen  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Rafael Salguero  
Criminal Docket No. 15-252 (S-1) (PKC)

Dear Judge Chen:

In advance of the defendant's sentencing, scheduled for December 6, 2018, at 2:30 p.m., the government respectfully submits this letter to request that the Court order that the transcript of the defendant's plea proceeding be unsealed in redacted form. The bases for maintaining limited portions of the transcript under seal are set forth in a separate, sealed submission filed today along with the proposed redacted transcript. The government also respectfully requests that the sealed docket entries relating to this defendant be unsealed for the limited purpose of permitting the government to review those entries in consultation with defense counsel to assess whether broader unsealing of any such entries is warranted at this time. Attached hereto is a proposed limited unsealing order.

Defense counsel has been consulted and takes no position on this request.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By:                     /s/                      
Samuel P. Nitze  
M. Kristin Mace  
Keith D. Edelman  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosure

cc: Clerk of Court (by ECF)  
Lou Freeman, Esq. (by ECF)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

LIMITED UNSEALING ORDER

- against -

CR 15-252 (PKC)

RAFAEL SALGUERO,

Defendant.

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Upon the application of RICHARD P. DONOGHUE, United States Attorney for the Eastern District of New York, by Assistant United States Attorney Samuel P. Nitze, for an order (1) unsealing a redacted plea transcript in the above-captioned matter, and (2) unsealing sealed docket entries relating to the above-referenced defendant for the limited purpose of permitting the government to review the entries, in consultation with defense counsel, to assess whether broader unsealing of any such entries is appropriate at this time,

IT IS HEREBY ORDERED that the transcript of the defendant's plea in the above-captioned case be unsealed with the redactions proposed in the government's sealed submission dated November 20, 2018;

IT IS FUTHER ORDERED that sealed docket entries related to the above-referenced defendant shall be unsealed for the limited purpose of permitting the government

to review those entries, in consultation with defense counsel, but that the sealed docket entries shall otherwise remain under seal.

Dated: Brooklyn, New York  
\_\_\_\_\_, 2018

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HONORABLE PAMELA K. CHEN  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF NEW YORK